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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EPIFANIO RAMIREZ,

Defendant.

CASE NO. 2:22-CR-147-02 WBS

STIPULATION TO SET STATUS CONFERENCE
AND TO EXCLUDE TIME PERIODS UNDER
SPEEDY TRIAL ACT; ORDER

DATE: June 30, 2025
TIME: 10:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, Epifanio Ramirez, by and through defendant's counsel of record, Olaf Hedberg, hereby stipulate as follows:

1. On May 28, 2025, the other defendants in this case requested via stipulation and proposed order a continuance of the June 2, 2025 status conference to August 18, 2025, asking that time be excluded for the purposes of the Speedy Trial Act, under local code T4. The Court so ordered. ECF No. 172.

2. Defendant Epifanio Ramirez requested that the Court set the matter for a change of plea on June 2, 2025, and indicated his intent to enter an open plea to the charges in the indictment.

3. The Court set the matter for a change of plea hearing on June 2, 2025. At that hearing, the change of plea proceedings began, but were set aside ultimately, and the matter was continued to June 30, 2025. ECF No. 173.

1 4. Defendant Ramirez has now indicated that he no longer intends to enter an open plea on
2 June 30, 2025, and instead requests that the matter be set for a status conference with the other
3 defendants.

4 5. By this stipulation, therefore, defendant Ramirez now moves to set his matter for the
5 Status Conference on **August 18, 2025 at 10:00 a.m.**, and to exclude time between the date of this
6 Court's order, below, and August 18, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

7 6. The parties agree and stipulate, and request that the Court find the following:

8 a) The government has produced discovery in this matter, consisting of over 1,300
9 pages of investigative reports and photographs, including arrest reports, DEA reports, and other
10 supporting documents. The government has also made available to the defense for viewing at the
11 U.S. Attorney's Office, by appointment, hours of video surveillance evidence for multiple
12 controlled drug buys in the underlying investigation.

13 b) Given the changes in scheduling a change of plea in this matter, defense counsel
14 requires further time to discuss the case with his client. As part of that, defense counsel desires
15 additional time to conduct investigation into the charges, the alleged roles of their respective
16 clients, and to review discovery in this case, including watching the video evidence the
17 government has made available. Defense counsel will need additional time to discuss potential
18 resolutions with his client, prepare pretrial motions, and otherwise prepare for trial.

19 c) Counsel for defendant believes that failure to grant the above-requested
20 continuance would deny him the reasonable time necessary for effective preparation, taking into
21 account the exercise of due diligence.

22 d) The government does not object to the continuance.

23 e) Based on the above-stated findings, the ends of justice served by continuing the
24 case as requested outweigh the interest of the public and the defendant in a trial within the
25 original date prescribed by the Speedy Trial Act.

26 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
27 et seq., within which trial must commence, the time period of June 30, 2025 to August 18, 2025,
28 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]

1 because it results from a continuance granted by the Court at defendant's request on the basis of
2 the Court's finding that the ends of justice served by taking such action outweigh the best interest
3 of the public and the defendant in a speedy trial.

4 7. Nothing in this stipulation and order shall preclude a finding that other provisions of the
5 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
6 must commence.

7 IT IS SO STIPULATED.

8 Dated: June 24, 2025

MICHELE BECKWITH
Acting United States Attorney

9
10 /s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney


11 Dated: June 24, 2025

12 /s/ OLAF HEDBERG
OLAF HEDBERG
Counsel for Defendant
13 EPIFANIO RAMIREZ

14
15 **ORDER**

16 IT IS SO FOUND AND ORDERED.

17 Dated: June 25, 2025

18 
WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE